

Reporting Year 2011

Emergency Planning + Community RIGHT-TO-KNOW Act (EPCRA) Section 313



Toxics Release Inventory Reporting Requirements

Recent Program Changes

Note: This program includes audio narration.
Use speakers or headphones for audio. Click Notes button for captions.

TRI

Industrial Sectors Covered

Industrial Sector	Notes
Manufacturing	Facilities engaged in the mechanical or chemical transformation of materials or substances into new products
Metal mining	Not including metal mining services, and uranium, radium, and vanadium ores
Coal mining	Not including coal mining services
Electrical utilities	Limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce
Treatment, Storage, and Disposal facilities	Limited to facilities regulated under the Resource Conservation and Recovery Act, Subtitle C, 42 U.S.C. Section 6921 et seq.
Solvent recovery services	Limited to facilities primarily engaged in solvent recovery services on a contract or fee basis
Chemical distributors	Facilities engaged in the wholesale distribution of chemicals and allied products
Petroleum bulk terminals	Facilities engaged in the wholesale distribution of crude petroleum and petroleum products from bulk liquid storage facilities



Covered NAICS Codes

- 2007 North American Industry Classification System (NAICS) codes are used for TRI reporting.
- To determine whether your facility's primary NAICS code is covered by TRI regulations, see:
www.epa.gov/tri/lawsandregs/naic/ncodes.htm

Employee Threshold

- 10 or more full-time employee equivalents (i.e., 20,000 hours) (40 CFR §§ 372.3 and 372.22(a))
 - **Worked for the facility**
 - **Includes operational staff, administrative staff, contractors, dedicated sales staff, company drivers, off-site direct corporate support**
 - **Does NOT include contract drivers or contractors performing intermittent service functions such as janitorial services (1998 Q&A #21, #29 and #38)**
 - **Add all hours from part-time and full-time employees**
- Determinations based on available time management systems/data

Section 313 Chemicals (Non-PBT) and Thresholds

- A facility meeting any of three applicable criteria must file a TRI Report for a non-PBT Section 313 chemical if the facility:

Non-PBT Thresholds

- **Manufactured (including imported)** more than 25,000 pounds of the chemical in the reporting year, *or*
- **Processed** more than 25,000 pounds of the chemical in the reporting year, *or*
- **Otherwise Used** more than 10,000 pounds of the chemical in the reporting year



Listed PBT* TRI Chemicals

- Within the list of 600+ chemicals and chemical categories, there is a subset designated as being of special concern and commonly referred to as PBT chemicals (40 CFR § 372.28)
- PBT chemicals have lower thresholds and different reporting requirements than the other TRI chemicals
 - **Special rules often apply to PBT chemicals**
- 20 chemicals and chemical compound categories are classified as PBTs and have lower reporting thresholds

***PBT = Persistent, Bioaccumulative, Toxic**



Section 313 Chemicals and Chemical Categories

- Current list contains over 600 individual chemicals and chemical categories (See Table II of the EPA's TRI Reporting Forms and Instructions document (RFI)). There are 4 parts to the chemical list:
 - Individual chemicals alphabetically by name
 - Individual chemicals by CAS #
 - Chemicals with qualifiers
 - Chemical categories
- The list can change – check every year. Changes listed in the front of the RFI, on the TRI website, and in *TRI-MEweb*.

PBT Chemicals and Thresholds

- PBT chemicals are subject to separate and lower thresholds (See 40 CFR § 372.28)

PBT Thresholds

- **100 lbs./yr (manufactured, processed, or otherwise used)**
 - Aldrin
 - Lead*
 - Lead Cmpds.
 - Methoxychlor
 - Pendimethalin
 - Polycyclic Aromatic Cmpds.
 - Tetrabromobisphenol A
 - Trifluralin
- **10 lbs./yr (manufactured, processed, or otherwise used)**
 - Chlordane
 - Heptachlor
 - Mercury
 - Toxaphene
 - Isodrin
 - PCBs
 - Benzo(g,h,i)perylene
 - Hexachlorobenzene
 - Mercury compounds
 - Octachlorostyrene
 - Pentachlorobenzene
- **0.1 g/yr (manufactured, processed, or otherwise used)**
 - Dioxin and dioxin-like compounds

• Excluding lead in stainless steel, brass, or bronze alloys

Chemical List Changes

- A rule was published on November 26, 2010, adding 16 new chemicals and chemical compounds to the TRI list of reportable chemicals.
 - Reporting for these new chemicals is required for Reporting Year 2011 (i.e., for reports due July 1, 2012).**

Individual Listings

Chemicals added to the Polycyclic Aromatic Compounds (PACs) category

Chemical Name

CAS#

1-Amino-2,4-dibromoanthraquinone
 2,2-bis(Bromomethyl)-1,3-propanediol
 Furan
 Glycidol
 Isoprene
 Methyleugenol
 o-Nitroanisole
 Nitromethane
 Phenolphthalein
 Tetrafluoroethylene
 Tetranitromethane
 Vinyl Fluoride

81-49-2
 3296-90-0
 110-00-9
 556-52-5
 78-79-5
 93-15-2
 91-23-6
 75-52-5
 77-09-8
 116-14-3
 509-14-8
 75-02-5

Chemical Name

CAS#

1,6-Dinitropyrene
 1,8-Dinitropyrene
 6-Nitrochrysene
 4-Nitropyrene

42397-64-8
 42397-65-9
 7496-02-8
 57835-92-4

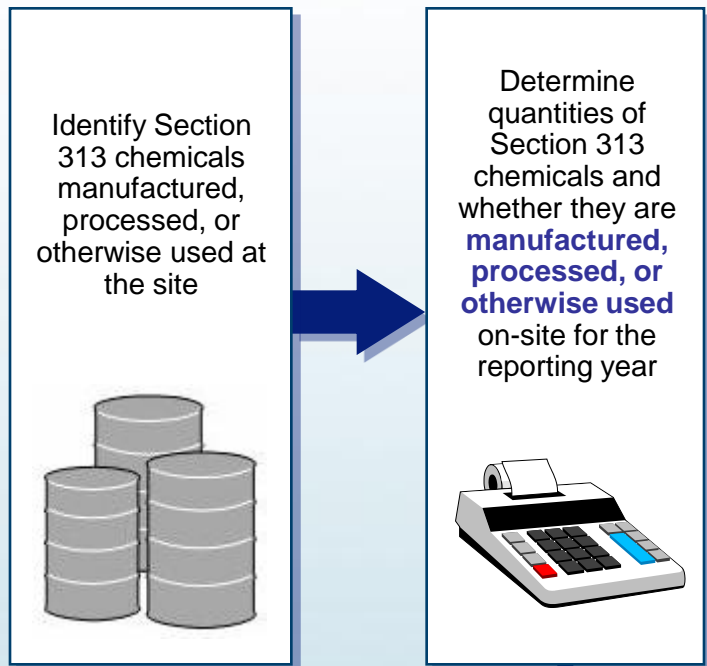
Chemical List Changes

- On October 17, 2011, the 1994 administrative stay for TRI reporting for hydrogen sulfide (H_2S) was lifted (76 FR 64022).
- ✓ **H_2S reporting will be effective for Reporting Year 2012**
 - **Due on July 1, 2013.**



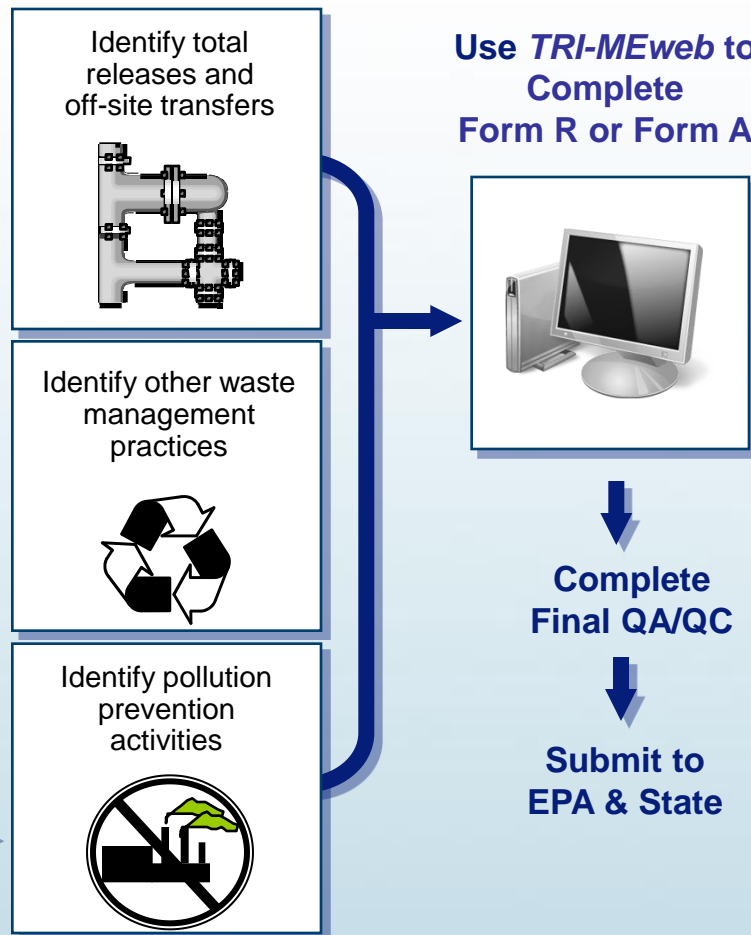
TRI Process – 2 Part Process

Applicability & Threshold Determinations



If a Threshold is Exceeded...

Release/Waste Mgmt. Reporting



Threshold Guidance

- The following activities are not considered “manufacturing,” “processing,” or “otherwise use”
 - **Remediation**
 - *Chemicals being remediated are not manufactured, processed, or otherwise used*
 - *Chemicals used to remediate waste ARE counted as otherwise used*
 - *Chemicals manufactured when treating or remediating waste ARE counted toward manufacturing threshold*
 - **Treatment of wastes generated on-site**
 - *Wastes brought in from off-site for treatment or other management count towards the otherwise use threshold*
 - **Storage**
 - **Recycling on-site for use on-site**
 - **Transferring chemicals off-site for further waste management**
 - *Not including recycling. Chemicals sent off-site for recycling are counted as processed.*
- These activities do not constitute threshold activities, but are not exempt from reporting if threshold is exceeded through other activities unless specifically eligible for one of the reporting exemptions
- Chemicals coincidentally manufactured during waste treatment or remediation must be considered

Chemical List Changes

- On October 17, 2011, the 1994 administrative stay for TRI reporting for hydrogen sulfide (H_2S) was lifted (76 FR 64022).
- ✓ **H_2S reporting will be effective for Reporting Year 2012**
 - **Due on July 1, 2013.**





Tools and Assistance

Reference Sources

- EPA Industry Guidance located at www.epa.gov/tri/guide_docs/
- *AP-42: Compilation of Air Pollutant Emission Factors* located at www.epa.gov/ttn/chief
- Technology Transfer Network located at www.epa.gov/ttn
 - **AP-42**
 - **WATER9 program**
 - **TANKS program**
- *Perry's Chemical Engineer's Handbook; CRC Handbook of Chemistry and Physics; Lange's Handbook of Chemistry*



Pollution Prevention Information

- OPPT Pollution Prevention (P2)
 - www.epa.gov/opptintr/p2home/index.htm
- Pollution Prevention Information Clearinghouse (PPIC)
 - **(202) 566-0799**
 - www.epa.gov/opptintr/ppic/index.htm

TRI Contact Information

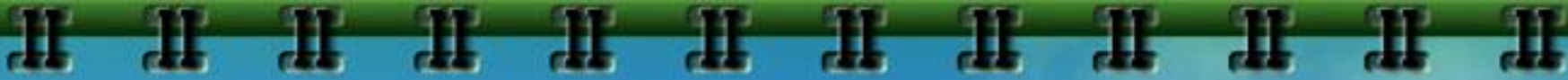
- TRI Technical Support
 - For technical questions related to *TRI-MEweb* and the Central Data Exchange (CDX), please contact the CDX Hotline at helpdesk@epacdx.net or call toll-free at (888) 890-1995 or
 - Or
- TRI Information Center
 - Provides a toll free number that facilities may call to obtain guidance on TRI reporting requirements and help on completing the TRI reporting forms.
 - The number is (800) 424-9346. Callers in the Washington, D.C. metropolitan area call (703) 412-9810. The TDD is (800) 553-7672.





TRI-Data Processing Center

- For hand courier, certified mail, Fed Ex, UPS delivery:
CGI Federal, Inc.
c/o EPA Reporting Center
12601 Fair Lakes Circle
Fairfax, VA 22033
- For regular mail:
TRI Reporting Center
P.O. Box 10163
Fairfax, VA 22038



Benefits of *TRI-MEweb* and Submitting Via CDX

- TRI forms can be filled from any computer that has an Internet connection
- It saves time and money
- Using *TRI-MEweb* significantly reduces reporting errors
- *TRI-MEweb* has integrated TRI Assistance Library
- EPA provides instant email confirmation of transmitted and certified submission
- Electronic Signature allows for quick, paperless submissions
- IMPORTANT: TRI-ME desktop software is no longer available. EPA only supports *TRI-MEweb*.



Benefits of *TRI-MEweb* and Submitting Via CDX (*cont.*)

- CDX submissions are processed automatically, unlike paper submissions, which leads to faster Facility Data Profile (FDP) access
- Reduced data collection costs for EPA, States, and Regulated Community
- Facilities in participating States can submit TRI information to both EPA and their State simultaneously.
 - To view States that are on the exchange network, go to www.epa.gov/tri/stakeholders/state/state_exchange/
 - Facilities in other states can generate CD's or diskettes for their state reporting using TRI-MEweb.

The background of the slide is a composite image. On the left, a worker in a blue uniform and yellow hard hat is looking at a smartphone. The background is a large industrial facility with tall distillation columns and complex piping. On the right, there is a 3D ball-and-stick model of a chemical molecule, possibly a substituted benzene or a complex organic compound, with orange, yellow, and green spheres representing different atoms. Below the molecule is a horizontal axis with tick marks and numerical labels: 20, 40, 60, 80, 100, 120, and 140. The text "TRI-MEweb Updates" is centered over the image in a white, bold, sans-serif font.

TRI-MEweb Updates



TRI-MEweb Features

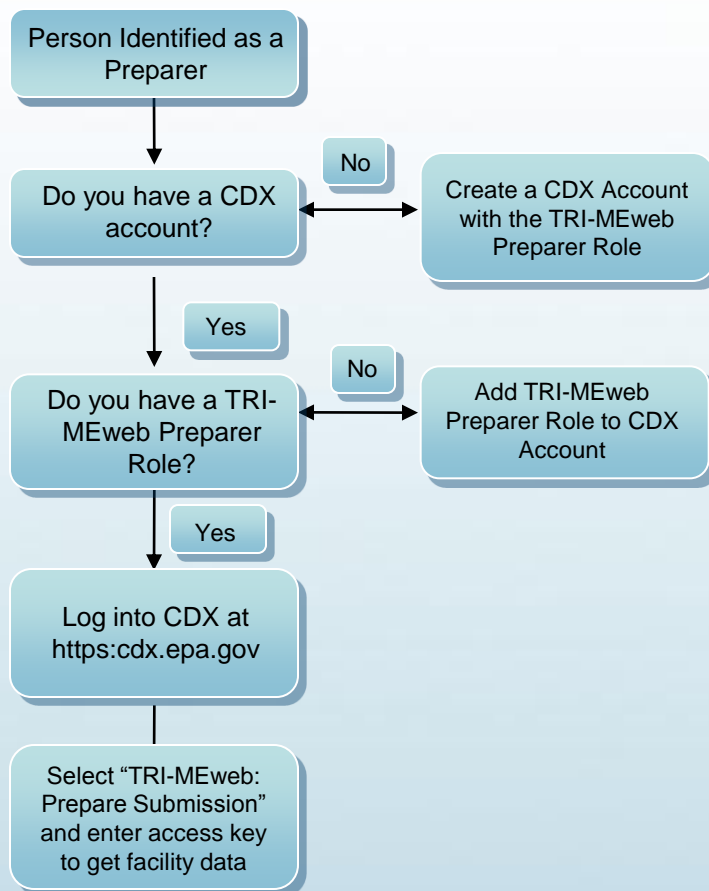
- Fully supports dioxin Form R/Schedule 1 reporting and provides calculated TEQ values for these forms
- Fully supports “Reporting By Part”
- Allows reporting for first-time filers and provides instant TRIFID identification for new facilities
- Supports original and revised reporting for RY2005 – 2010
- Generates submissions for state reporting
- Ability to upload third party vendor data using *TRI-MEweb* XML schema to allow quicker multi-chemical data uploads.

Important Notices on *TRI-MEweb*!

- *TRI-MEweb* requires new certifiers to register with the Central Data Exchange (CDX) prior to being able to certify *TRI-MEweb* forms.
 - Registration includes creating, signing, and sending an electronic signature agreement (ESA) to the TRI data processing center
 - This process is estimated to take a minimum of 5 business days
 - Submission of the ESA is one time only as long as the certifier represents the facility
 - EPA recommends that facilities using *TRI-MEweb* register their certifier immediately upon accessing the application
 - For more information about *TRI-MEweb*, please visit: www.epa.gov/tri/report/software/index.htm
- EPA's CDX recently changed from SSL encryption to TLS encryption.
 - If users are not able to access the CDX or *TRI-MEweb* due to a security setting issue, change security settings in the web browser.
 - If using "Internet Explorer," in "Tools" menu, select "Internet Options." Under the "Advanced" tab, scroll to the bottom and check the "Use TLS 1.0" box.

TRI-MEweb Registration (Preparer)

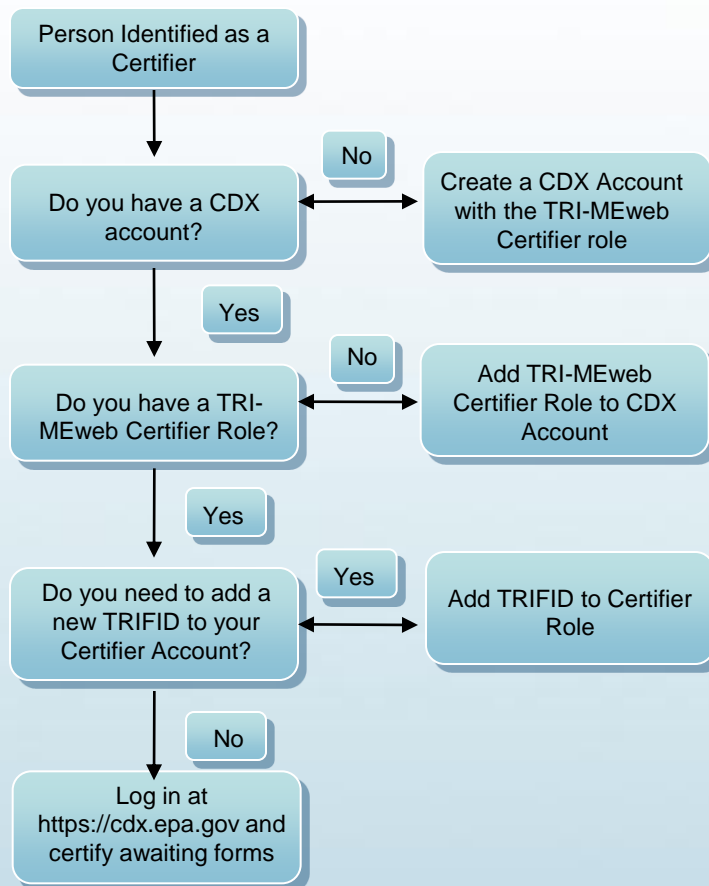
Preparer Registration Decision Tree



Note: For more information, see the TRI-MEweb Tutorials at www.epa.gov/tri

TRI-MEweb Registration (Certifier)

Certifier Registration Decision Tree



Note: For more information, see the TRI-MEweb Tutorials at www.epa.gov/tri

TRI-MEweb Tutorials

- *TRI-MEweb* has integrated on-line tutorials to assist users with common functions in the application.
 - **Tutorials cover areas such as**
 - *Overview*
 - *Registration*
 - *Accessing Your Facility*
 - *Nominating a Certifying Official*
 - *Section 8 Calculator*
 - *Submitting Data*
 - *Certifying Data*
 - *Getting Help*
- The tutorials can be viewed at:
 - www.epa.gov/tri/report/software/index.htm

- TRI website for reporting materials and guidance
- Includes:
 - **Electronic versions, or links to electronic versions, of the statutes, regulations, executive orders, chemical-specific guidance documents, and industry-specific guidance documents**
- TRI Frequently Asked Questions (FAQ) Service
 - **Browse frequently asked questions and answers**
 - **Submit new questions**
 - **Access to the service is available from the TRI Web site: www.epa.gov/tri/. Click on “Frequent Questions” on the left side menu bar.**

Facility Data Profiles

- Facilities that have prepared and transmitted a Form R and/or a Form A and have certified the submission in which the form was contained under EPCRA Section 313 may review an eFDP within *TRI-MEweb*.
- The eFDP serves as a receipt of your TRI submission's successful processing at the TRI Data Processing Center (DPC).
- Preparers of both *TRI-MEweb* and Paper TRI submissions may view an eFDP within *TRI-MEweb*.
- Please note that *TRI-MEweb* currently only supports accessing eFDPs for RY 2005 and later forms.
- If you have problems accessing your FDPs, contact:
 - **E-mail:** tri.efdp@epacdx.net
 - **Web:** www.triefdp.org

Welcome My Facilities Prepare Validate Transmit Review **eFDP**

Welcome | Do I Need to Report? | Introduction | Important Information for RY2011 Reporting | TRI-MEweb Enhancements

Welcome to Our Web-based Reporting Tool!

TRI-MEweb Announcements

Update on Monday, 4/23/12: EPA is pleased to announce a new release of the *TRI-MEweb* application. This new release includes a number of enhancements, the most significant of which is the integration of the electronic Facility Data Profile (eFDP) functionality into *TRI-MEweb*. The eFDP serves as a receipt of your TRI submission's successful processing at the TRI Data Processing Center (DPC).

Facilities that used *TRI-MEweb* to submit forms to EPA can view their receipt and error report by clicking the **eFDP** tab found above. If the eFDP contains any errors, the TRI form data can easily be corrected by expanding the facility's information on the "Welcome" page to display the Forms Summary table, locating the form, and clicking the "Revise" link to make the appropriate corrections and transmit the form to CDX for certification.

Facilities that submitted paper TRI forms can view their receipt and error report by clicking the **eFDP** button found below and entering their facility's access key, which was provided in an email to their facility's technical contact. The user will then follow a step-by-step process to gain access to their facility in *TRI-MEweb*. Once the user has gained access to their facility they will be able to view the facility's information. Note that the data from TRI forms submitted via paper will not be available for import into *TRI-MEweb* until the next reporting year. If the eFDP contains any errors, corrections can be made printing the eFDP to revise it, sign it, and mail it to the TRI Data Processing Center (DPC). New *TRI-MEweb* users may also enter TRI form data into *TRI-MEweb*, transmit the form to CDX, and have the certifying official certify the submission in CDX.

Note that the TRI forms were modified for Reporting Year (RY) 2011. You'll see this icon  displayed when pages have been added or modified for the RY 2011 TRI forms.

You may visit the "*TRI-MEweb* Enhancements" page to learn more information about the newest enhancements that have been built into the RY 2011 *TRI-MEweb* application.



It appears that you previously exited *TRI-MEweb* on the following page:

Reporting Year: 2011

TRIFID: N/A

Chemical: N/A

Page: Select a Facility

[Would you like to return to this page?](#)



This Web-based application will help you create, correct, and transmit electronically your TRI Form R or Form A to comply with EPCRA Section 313 reporting requirements by 11:59:59 PM Eastern Time (ET) on July 1, 2012.

The following table provides you quick access to all chemical forms for each facility.

[Back](#) [Index](#) [Next](#)[Go To Form Mode](#)[View Form](#)[Validate](#)Helpful Links: [USEPA Home](#) | [TRI Program Home](#) | [Reporting Forms and Instructions \(PDF\)](#) | TRI-MEweb Version RY2011.02.1[Contact Technical Support](#)

TRI-MEweb Help Area



Regulatory Information

- [Access the TRI Assistance Library](#)
- [Important information for RY2011](#)
- [General TRI information](#)
- [More about TRI](#)
- [Additional help resources](#)



TRI-MEweb User Guide

- [Access the TRI-MEweb User Guide](#)
- [Welcome to the TRI-MEweb User Guide](#)
- [How do I use this page?](#)



TRI-MEweb Tutorials

- [Access the TRI-MEweb Tutorials](#)

Revising TRI Data – Preferred Method

- The preferred method for submitting revised TRI forms is *TRI-MEweb*, through the Internet via EPA's CDX.
- For more information regarding revisions, go to:
 - www.epa.gov/tri/report/index.htm#revise
- For states that participate in the TRI Data Exchange (TDX), submitting via CDX to EPA will also satisfy your state obligations. For states that do not participate in TDX, revisions must also be submitted in the state-specified format (e.g., diskette, paper, etc.) To determine if your state is CDX capable go to:
 - www.epa.gov/tri/stakeholders/state/state_exchange/

Withdrawing TRI Data – Preferred Method

- Submitting a withdrawal TRI form, using *TRI-MEweb*, through the Internet via EPA's CDX, is the preferred method for RY2005 – 2010
- For more information regarding withdrawals, go to:
 - [www.epa.gov/tri/report/reviseandwithdraw/withdraw TRI data.pdf](http://www.epa.gov/tri/report/reviseandwithdraw/withdraw_TRI_data.pdf)
- Please be aware if your state is a TRI Data Exchange (TDX) participant, submitting to EPA via CDX will also satisfy your state obligations. For states that are not TDX participants, withdrawals must also be submitted in the state-specified format (e.g., diskette, paper, etc.)

Submitting Revisions and Withdrawals

- Form R submitted to replace previously filed Form A Certification Statement
 - **Considered to be a late submission of a Form R and a request for a withdrawal of the previously filed Form A Certification Statement**
 - **Do not check the revision box!**
 - **Note that submitting a Form A when a Form R is required is considered a less severe violation than failing to submit either form (cfpub.epa.gov/compliance/resources/policies/civil/epcra/index.cfm)**
- For a change in chemical reported (including a metal to a metal compound) you must withdraw the original submission and re-submit for the new chemical. This is not a revision.
- See www.epa.gov/tri/report/index.htm#revise for more information on revisions and withdrawals